



Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

December 20, 2007

Joyce A. Collins
Assistant Field Supervisor
United State Fish and Wildlife Service
Crab Orchard National Wildlife Refuge
8588 Route 148
Marion, IL 62959

RE: FAP 999 (New Mississippi River Crossing, Relocated 1-70 and I-64
Connector) and FAP 14 (IL Route 3 Relocation)
Madison and St. Clair Counties
BDE Seq. No.: 27 and 33

Dear Ms. Collins:

On December 5, 2007, we met to discuss the status of the Illinois Department of Transportation's (IDOT) effort to implement the conservation recommendations contained in your September 7, 2000 Biological Opinion which was based on a review of the above captioned project and its effects on the threatened decurrent false aster (*Boltonia decurrens*). Our effort began in 2002 and has continued through 2006. We have coordinated with you the results of the effort in yearly status reports prepared by Illinois Natural History Survey (INHS).

The following summarizes the status of our effort to implement each of the conservation recommendations contained in your Biological Opinion.

The first recommendation was to reestablish populations of *B. decurrens* on all suitable wetland mitigation sites which may be within the project vicinity. In 2002, the IDOT owned three wetland mitigation sites within the project vicinity including sites near Cahokia, Fairmont City and Stallings, IL. Only the Cahokia site was deemed suitable for the establishment of *B. decurrens*. August 2003, seed collected from a colony of *B. decurrens* at the Fairmont City site was sown at the Cahokia site. October 2006, only one *B. decurrens* plant could be found. July 2005, 40 *B. decurrens* seedlings were planted in test plots at the site. A few weeks after planting, 39 of the seedlings appeared to have survived the transplanting. October 2006, seven of the transplants were found alive. The remaining seven plants appeared to be healthy and had recently flowered.

Joyce A. Collins
United State Fish and Wildlife Service
December 20, 2007
Page Two

The second recommendation was that the IDOT implement a monitoring plan for at least five years to determine if the established populations are stable or expanding. Despite attempts, no populations of *B. decurrens* were successfully established at the Cahokia wetland mitigation site and thus, the second recommendation was not implemented.

The third recommendation was to implement a monitoring program for the colonies of *B. decurrens* occurring in the project area, but which will not be affected by construction activities to determine if these populations are stable or expanding. Twenty-two colonies of *B. decurrens* were monitored in the project area (Colony 2 and portions of colonies 4, 7, 9, 10, 11 and 14 would be lost permanently to highway construction; however, all sites were monitored in their entirety.). In 2006, five of the original 22 colonies had no plants present and none of the colonies that were extant could be called stable or expanding. None of the colonies increased in size every year of the monitoring period. Data suggest that populations of *B. decurrens* are inherently unstable and that their size and number decline in the absence of disturbance, such as flooding.

The last recommendation was for the IDOT to obtain conservation easements on properties containing the largest concentrations of *B. decurrens* in order to protect these colonies from future development. As of 2006, colonies 23, 11 and 7 held the largest and most viable concentrations *B. decurrens* within the project area. Colony 23 held the single largest concentration with 750,000 to 1,000,000 plants in an area approximately 14.1 acres. Colony 23 is located on the Fairmont City Illinois Natural Areas Inventory site. This site may be protected, as the INHS reports that it is posted with wording to indicate such. Colonies 11 and 7 are threatened by human disturbance and to our knowledge there are no protections in place. Colonies 20 and 21, although much smaller than colonies 23, 11 and 7, are located within the IDOT proposed Fairmont City (golf course) wetland mitigation site and these colonies have been afforded some long-term protection because the site was acquired by the IDOT and plans will include the conservation of *B. decurrens*.

Information on the IDOT's effort to conserve *B. decurrens* will be available at www.dot.il.gov/desenv/environmental. An electronic file of the mapped colonies of *B. decurrens* and new records of occurrences will be entered into the IDNR Natural Heritage Database. The INHS will continue to monitor the Cahokia and Fairmont City (golf course) sites for *B. decurrens* through 2012.

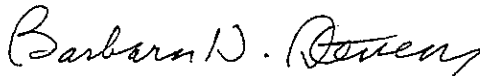
On December 5, 2007, we agreed that the IDOT had put forth a good faith attempt to implement the conservation recommendations contained in the Biological Opinion and that this letter would serve to document closure of the effort.

Joyce A. Collins
United State Fish and Wildlife Service
December 20, 2007
Page Three

If you have any questions or need clarification, please contact Tom Brooks at
(217) 785-2943 or Thomas.brooks@illinois.gov.

Sincerely,

Eric E. Harm
Interim Engineer of Design and Environment



By: Barbara H. Stevens
Chief of Environmental Section

cc: Jennifer Hunt (D-8)
Steve Hamer
Mark Phipps (IDNR)
